

REMARKS

Applicant appreciates the time taken by the Examiner to review Applicant's present application. This application has been carefully reviewed in light of the Official Action mailed January 9, 2008. Independent claims 1, 16 and 31 are amended herein. Support for the amendments to the claims presented herein can be found in the Specification as originally filed, at least in paragraphs 51, 53, 59-60, and Appendix C. No new matter is introduced. No claims are newly added or cancelled herein. Thus, claims 1-53 remain pending. Applicant respectfully requests reconsideration and favorable action in this case.

Interview Summary

Pursuant to Applicant Initiated Interview Request submitted on January 8, 2008, a telephonic interview was conducted January 30, 2008 between Examiner Ted Vo, Attorneys Katharina Schuster and Ari Akmal, and Agent Kevin Gust. During the interview, differences between embodiments as claimed and the cited prior art as well as possible amendments to the claims were discussed. Applicant appreciates the time taken by Examiner Vo to discuss the claims and review Applicant's present application.

Rejections under 35 U.S.C. § 112

Claims 16-45 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Claims 16 and 31 are amended to point out the computer having a computer memory and a processor. Support may be found at least in paragraphs [0049-0050, and 0052]. Accordingly, withdrawal of this rejection is respectfully requested.

Rejections under 35 U.S.C. § 101

Claims 1-53 were rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. In particular, the Examiner states that the claims as a whole present a mere model comprising two components with relationships between them, but that this type of claim fails to provide any specific application. Claims 1, 16 and 31 are currently amended to point out

specific features of the invention. Accordingly, withdrawal of this rejection is respectfully requested.

Rejections under 35 U.S.C. § 102

Claims 1-53 were rejected as anticipated by *Database Design for Smarties Using UML for Data Modeling* by Robert Muller ("Muller"). The rejection is respectfully traversed. Independent claims 16 and 31 recite limitations similar to those recited in claim 1. Accordingly, traversal to the rejection will be collectively discussed herein with respect to independent claim 1.

M.P.E.P. § 2131 states, "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the . . . claim." *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1987).

As a good faith attempt to forward the prosecution, independent claim 1 is amended herein to particularly recite:

A method of modeling an arbitrarily complex environment, comprising:

On a computer having a computer memory and a processor, defining data structures for dynamically accommodating changes to the arbitrarily complex environment in a data model, wherein the data structures comprise components and relationships;

representing each atomic entity in the arbitrarily complex environment with a component in the data model, wherein each atomic entity is a logical or physical entity in the arbitrarily complex environment and wherein the component has a set of fields which contain information relating to the atomic entity associated with the component;

representing an association or a dependency between two or more components in the data model with a relationship, wherein the relationship has a name field containing a relationship name which is built programmatically and which automatically associates the relationship with two or more physical or logical entities that correspond to the two or more components; and

automatically changing the relationship to reflect a corresponding change in the arbitrarily complex environment.

Thus, embodiments as claimed in claim 1 are directed to a method for modeling an arbitrarily complex environment. Each logical or physical entity in the arbitrarily complex environment is represented in a data model by a component having a set of fields which

contains information relating to the atomic entity. An association or dependency between two or more components is represented by a relationship. The name field of the relationship is built programmatically and automatically associates the relationship with two or more logical or physical entities that correspond to two or more components. The relationship is automatically changed to reflect a corresponding change in the arbitrarily complex environment.

In contrast, Muller describes transforming a UML data model into a relational database, including structures, relationships and constraints of a UML data model; data normalization; and transforming an object-oriented data model into a SQL-92 schema. Muller does not describe, *inter alia*, modeling an arbitrarily complex environment, programmatically building relationship names, or automatically changing the relationship to reflect a corresponding change in the arbitrarily complex environment. For at least these reasons, Applicant respectfully submits that Muller does not teach the limitations of claim 1. Accordingly, withdrawal of this rejection is respectfully requested.

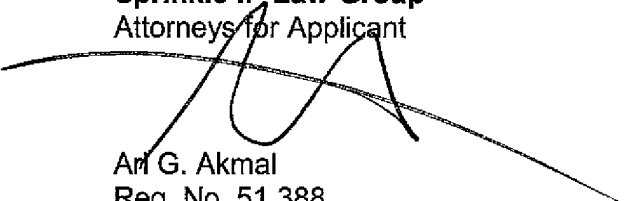
Conclusion

Applicant has now made an earnest attempt to place this case in condition for allowance. Other than as explicitly set forth above, this reply does not include an acquiescence to statements, assertions, assumptions, conclusions, or any combination thereof in the Office Action. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests full allowance of Claims 1-53. The Examiner is invited to telephone the undersigned at the number listed below for prompt action in the event any issues remain.

The Director of the U.S. Patent and Trademark Office is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 50-3183 of Sprinkle IP Law Group.

Respectfully submitted,

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